

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

SIMRET SEMERE TEKLE,

Plaintiff,

v.

NOUF BINT NAYEF ABDUL-AZIZ AL
SAUD, MOHAMMAD BIN ABDULLAH AL
SAUD,

Defendants.

Case No. 1:18-cv-211

**PLAINTIFF’S MEMORANDUM IN OPPOSITION TO DEFENDANTS’ MOTION TO
COMPEL PRODUCTION OF ADDITIONAL MEDICAL RECORDS**

Plaintiff Simret Semere Tekle believes that Defendants’ motion to compel (ECF No. 144) is now moot, as she has produced the additional medical records sought.

Plaintiff’s counsel have taken the Court’s admonition to heart. Plaintiff produced to Defendants the unredacted medical records immediately following the May 10, 2019 hearing while the parties were still at the courthouse. This included all medical records that Plaintiff’s counsel possessed and had turned up in their search. That afternoon, Defense counsel sought a meet-and-confer with Plaintiff’s counsel and informed Plaintiff’s counsel that, based on their review of the records, they believed that some records relating to a particular procedure were still missing. Plaintiff’s counsel had not noticed this in her review of Plaintiff’s medical records.

During the meet-and-confer, Plaintiff’s counsel reaffirmed that they had produced all of the records in their possession, but that they would obtain any missing records from the

appropriate provider as soon as possible. *See* Ex. A, Email from Martina Vandenberg to Stuart Nash (May 10, 2019).

Plaintiff has now done so. The records at issue are the state-required forms, including consent forms—and Plaintiff produced those records to Defense counsel, all by 1:02 pm on Wednesday.

Plaintiff believes this motion was unnecessary in light of her promise to promptly rectify this situation once her counsel was made aware of the potentially missing records at the Friday afternoon meet-and-confer. Plaintiff believes this motion is moot.

Dated: May 15, 2019

Respectfully submitted,

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Counsel for Plaintiff Simret Semere Tekle

CERTIFICATE OF SERVICE

I certify that I uploaded Plaintiff's Memorandum in Opposition to Defendants' Motion to Set Aside the Magistrate Judge's Discovery Order to the Court's CM/ECF system today, which will cause a Notice of Electronic Filing and a link to the document to be sent to all counsel of record.

May 15, 2019

//s// Simon Sandoval-Moshenberg

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